

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NORTH DAKOTA

In re:	)	Case No. 24-30422
	)	(Chapter 11)
JAMIESON CAPEX FUND, LLC.	)	
	)	
Debtor.	)	
_____	)	

**MOTION TO APPEAR VIA VIDEO CONFERENCE**

Comes now Jamieson CAPEX Fund, LLC (“CAPEX” or the “Debtor”), by and through undersigned counsel, pursuant to Local Rule 5001-2(B), and moves this Honorable Court for leave to have the Debtor’s counsel participate in the December 31, 2024 stay relief hearing via video conference, and in support thereof states as follows:

A hearing has now been set on the pending stay relief motion of Jeff Johnson, for December 31, 2024 at 10:00 am. *See* DE #74. Undersigned counsel is fully prepared to participate in the hearing, make appropriate arguments and, to the extent necessary, elicit appropriate evidence. The date of the hearing does, however, present certain anomalous travel logistics that, while not impossible to navigate, do occasion a less-than-desirable itinerary.

Undersigned counsel resides in rural Maine. The closest commercial airport is in Bangor, from which it is possible to travel to Fargo on December 30 without any unusual eccentricities. Returning to Maine after a hearing on December 31, however, will prove slightly more complex, with the only afternoon flights out of Fargo requiring, in turn, a travel time of at least 25 hours, inclusive of an overnight layover in either Dallas or Indianapolis (with the Indianapolis option, ironically, only being viable if a connection is first made in Dallas).

Insofar as the “overnight” in question is New Year’s Eve, there exists some desire—intangible as it may be—to spend the occasion at home. This is, to be sure, a purely personal preference, and one not guided by any cognizable legal necessity or obligation. But given that the

hearing is likely to consist chiefly of legal argument, and given that video conference technology has evolved to a particularly high standard of functionality, it is hoped the Debtor's counsel may be able to attend this hearing remotely without the need to alter holiday plans (mundane as they may otherwise be).

WHEREFORE, CAPEX respectfully prays this Honorable Court (i) allow CAPEX's counsel to participate in the stay relief hearing via video conference; and (ii) afford such other and further relief as may be just and proper.

Respectfully Submitted,

Dated: December 26, 2024

By: /s/ Maurice B. VerStandig  
Maurice B. VerStandig, Esq.  
The Dakota Bankruptcy Firm  
1630 1st Avenue N  
Suite B PMB 24  
Fargo, North Dakota 58102-4246  
Phone: (701) 394-3215  
mac@dakotabankruptcy.com  
*Counsel for the Debtor*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 26th day of December, 2024, a copy of the foregoing was served electronically upon filing via the ECF system.

/s/ Maurice B. VerStandig  
Maurice B. VerStandig